

UNDER GOD,

LODGED
CLERK, U.S. DISTRICT COURT
2/20/25
CENTRAL DISTRICT OF CALIFORNIA
BY <u>MRV</u> DEPUTY
DOCUMENT SUBMITTED THROUGH THE ELECTRONIC DOCUMENT SUBMISSION SYSTEM

CASE # 2:25-cv-01563-UA

IN THE UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF THE STATE OF CALIFORNIA

T. H, on behalf of minor child R.S. III,

Plaintiff,

v.

**PASADENA UNIFIED SCHOOL DISTRICT (PUSD), PASADENA BOARD OF EDUCATION,
STATE OF CALIFORNIA GENERAL SERVICES, and Dr. ELIZABETH BLANCO BRANDI
WOJCIECHOWSKI, ALICIA FLORES, MIRIAN MEEHAN, ADRIANA GARCIA, RAFE
GOODWELL, OWENS ORDONEZ, RYAN FLORES, ANA DEMARCO, ROBERT GALVAN,
AIKATERINI (KATERINA) KALYVIOTI, RENEE CRUZ, JENNIFER HALL LEE, TINA
FREDERICKS, KIMBERLEY KENNE, individually and in their personal capacities,**

Defendants.

Case No.: _____

JUDGMENT AND ORDER

**WHEREAS, Plaintiff has properly served Pasadena Unified School District (PUSD),
Pasadena Board of Education, State of California General Services, and individually
named Defendants with the Complaint, Summons, and Demand for Proof of Authority; and**

WHEREAS, Defendants have been required to provide within three (3) days of service:

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1. **A certified copy of their Oath of Office;**
2. **A certified copy of their Public Fiduciary Bond;**
3. **Proof of lawful delegation of authority** to act in their official capacity; and

WHEREAS, the time allotted for Defendants to provide such documentation has expired, and no such proof has been filed with the Court or served upon Plaintiff; and

WHEREAS, failure to provide these documents constitutes an admission that Defendants **lack lawful jurisdiction and authority** to enforce policies and take actions affecting Plaintiff and minor child **R.S. III**; and

WHEREAS, the Court finds that Defendants' actions in denying **R.S. III an Individualized Education Program (IEP)** and related special education services were conducted **without lawful authority and in violation of federal law**;

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED AS FOLLOWS:

1. **DECLARATORY RELIEF GRANTED:** The Court declares that Defendants acted **without lawful authority** and in violation of **IDEA (20 U.S.C. § 1400 et seq.), ADA (42 U.S.C. § 12101 et seq.), and Section 504 of the Rehabilitation Act (29 U.S.C. § 794)** by unlawfully revoking R.S. III's IEP.
2. **INJUNCTIVE RELIEF GRANTED:** Defendants are hereby **ORDERED** to:

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- **Immediately reinstate R.S. III's IEP** with all required services, including but not limited to hearing aids, assistive technology, tutoring, and other legally mandated accommodations.
- **Cease all discriminatory practices** against Plaintiff and R.S. III based on disability.
- **Refrain from further enforcement of policies** or actions affecting R.S. III without demonstrating lawful authority.

3. **MONETARY DAMAGES:** Plaintiff is awarded **\$500,000 per day** from April 12, 2024, through the date of this Judgment for the continued deprivation of **R.S. III's educational rights**, totaling **\$157,000,000** as of February 20, 2025.

4. **DEFAULT JUDGMENT ENTERED:** Due to Defendants' failure to rebut the allegations or provide proof of authority within the required timeframe, default judgment is **entered against all Defendants in their personal capacities** for violations of federal disability protections.

5. **ORDER TO PROVIDE PROOF OF AUTHORITY:** If Defendants seek to contest this Judgment, they must first **file with the Court certified proof** of their lawful authority to act, including their **Oath of Office, Public Fiduciary Bond, and Delegation of Authority** within **three (3) days** of this Order. Failure to do so shall result in further enforcement actions.

6. **ENFORCEMENT:** The Court retains jurisdiction over this matter to ensure compliance with this Order. Failure to comply shall result in contempt proceedings and further sanctions as necessary.

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IT IS SO ORDERED.

DATED: _____

BY THE COURT:

UNITED STATES DISTRICT JUDGE

DATED: 2/20/2025

Respectfully submitted,



T.H

600 Lincoln Ave.

Pasadena, Ca 91103

Sui Juris, Plaintiff